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7 Attorneys for Specially Appearing Defendant  
8 RCI HOSPITALITY HOLDINGS, INC.

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11  
12 JULIA HUBBARD and KAYLA  
GOEDINGHAUS,

13 Plaintiffs,  
14 vs.

15 TRAMMELL S. CROW, JR., DR.  
BENJAMIN TODD ELLER, RICHARD  
16 HUBBARD, DR. MELISSA MILLER,  
DR. JOSEPH BOLIN, DR. SCOTT  
17 WOODS, DR. MRUGESHKUMAR  
SHAH, MICHAEL CAIN, COE  
18 JURACEK, PHILIP ECOB, H.J. COLE,  
TEXAS RANGER CODY MITCHELL,  
19 KURT KNEWITZ, PAUL  
PENDERGRASS, RALPH ROGERS,  
20 ROBERT PRUITT, SCOTT BRUNSON,  
CASE GROVER, RICHARD BUTLER,  
21 MARK MOLINA, MICHAEL HYNES,  
JR., SHAWN MAYER, JADE MAYER,  
22 RCI HOSPITALITY HOLDINGS, INC.,  
INTEGRITY BASED MARKETING,  
23 LLC, STORM FITNESS NUTRITION,  
LLC, ULTRA COMBAT NUTRITION,  
24 LLC, ECOLOFT HOMES LLC,  
ELEVATED WELLNESS PARTNERS  
25 LLC, DOE INDIVIDUALS 1-20, and  
DOE COMPANIES 21-30,

26 Defendants.  
27  
28

CASE NO. 2:22-cv-7957

**[PROPOSED] ORDER GRANTING  
DEFENDANT RCI HOSPITALITY  
HOLDINGS, INC.'S MOTION TO  
DISMISS FOR LACK OF  
PERSONAL JURISDICTION, OR  
IN THE ALTERNATIVE, MOTION  
TO DISMISS FOR FAILURE TO  
STATE A CLAIM [DKT. 83 ]**

Date: April 7, 2023  
Time: 1:30 p.m.  
Dept: 6B, 6<sup>th</sup> Floor

Assigned to: Hon. Judge Fernando L.  
Aenlle-Rocha

Action Filed: November 1, 2022  
Trial Date: None Set

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On February 27, 2023, Defendant RCI Hospitality Holdings, Inc. filed a Motion to Dismiss for Lack of Personal Jurisdiction, Or In The Alternative, Motion To Dismiss For Failure To State A Claim.

RCI Hospitality Holdings, Inc. lacks minimum contacts with California, has not purposefully availed itself to the law and protections of California, and does not live in California. Further, Plaintiffs do not sufficiently allege a multidistrict conspiracy and/or Texas is an alternative forum under 18 U.S.C. § 1965(b) thereby negating the need to grant nationwide jurisdiction. Alternatively, Plaintiffs' improper shotgun Complaint fails to comply with Rule 8 notice requirements, Plaintiff Kayla Goedinghaus asserts no allegations against RCI Hospitality Holdings, Inc., Plaintiffs fail to allege sufficient facts to substantiate a claim for sex-trafficking and/or labor-trafficking, the RICO claims are time-barred, and the RICO claims fail to plead facts plausibly showing Defendant's participation in an enterprise.

The Court, having considered the Motion and finding good cause therefor, hereby GRANTS the Motion and ORDERS as follows: The above-captioned action as against Defendant RCI Hospitality Holdings, Inc. is dismissed.

IT IS SO ORDERED.

DATED: \_\_\_\_\_, 2023

Hon. Fernando L. Aenlle-Rocha  
 Judge, United States District Court

**PROOF OF SERVICE****JULIA HUBBARD and KAYLA GOEDINGHAUS v. TRAMMELL S. CROW,  
JR. et al.****United States District Court -- Central District Case No. 2:22-cv-07957****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 355 South Grand Avenue, Fifteenth Floor, Los Angeles, CA 90071-1560.

On February 27, 2023, I served true copies of the following document(s) described as **[PROPOSED] ORDER GRANTING DEFENDANT RCI HOSPITALITY HOLDINGS, INC.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION, OR IN THE ALTERNATIVE, MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM [DKT. 83 ]** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 27, 2023, at Los Angeles, California.



Chantel Y Estrada

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## SERVICE LIST

**JULIA HUBBARD and KAYLA GOEDINGHAUS v. TRAMMELL S. CROW, JR.**  
*et al.*

**United States District Court -- Central District Case No. 2:22-cv-07957**

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